



Region 4

Lead and Asbestos Section
61 Forsyth Street SW
Atlanta, GA 30303-8960

INSPECTION REPORT

Entity Inspected Sumter School District
1345 Wilson Hall Road
Sumter, SC 29151
Lat: 33.925161, Long: -80.341057

Inspection Type Toxic Substances Control Act (TSCA)
Asbestos Hazard Emergency Response Act (AHERA)

Inspection Date August 7, 2018

Inspector Yvonne Lawson

Introduction

A compliance inspection pursuant to Section 11 of TSCA was conducted on August 7, 2018, at the Sumter School District Local Education Agency (LEA) administrative office located at 1345 Wilson Hall Road in Sumter, South Carolina. The inspection was conducted by Ms. Yvonne Lawson, who is an employee of the U.S. Environmental Protection Agency Region 4 and is an Inspector for the TSCA AHERA program. Ms. Lawson possesses EPA credentials and is also an experienced Clean Air Act National Emissions Standards for Hazardous Air Pollutants (Asbestos) and TSCA lead-based paint inspector. The purpose of the inspection was to determine compliance with TSCA AHERA and the regulations promulgated at 40 C.F.R. Part 763.

The Lead and Asbestos Section received a tip/complaint regarding alleged asbestos renovation/demolition activities occurring at Cherryvale Elementary School and R.E. Davis College Preparatory Academy, schools under the control of the LEA. A review of the EPA TSCA AHERA compliance monitoring inspection records for Cherryvale Elementary School and R.E. Davis College Preparatory Academy revealed that a LEA AHERA three-year asbestos reinspection was due to be conducted at the schools. Therefore, the LEA was targeted for a compliance monitoring inspection (the inspection).

On August 1, 2018, Ms. Lawson contacted Dr. Debra Hamm, Interim Sumter School District Superintendent, to schedule the inspection date and time and informed her that she would inspect Cherryvale Elementary School and R.E. Davis College Preparatory Academy. On August 2, 2018, Ms. Lawson spoke to Mr. Dana Fall, Chief Operations Officer, Sumter School District, and confirmed the inspection date and time.

Inspection

Entry and Opening Conference

The records review inspection took place in the administrative office of the LEA on August 7, 2018, at 10:00 am. Upon entry, Ms. Lawson introduced herself and presented her EPA inspection credentials to Mr. Dana Fall, Chief Operations Officer of Sumter School District. In attendance also were Mr. Clyde K. Chan, Director of Maintenance of Sumter School District; Mr. George D. Cobb, the LEA's contracted LEA designee; and Ms. Lisa

Tye, Mr. Cobb's business partner. Ms. Lawson presented a TSCA Notice of Intent, Action form and a TSCA Confidentiality Notice (see attached) to Mr. Fall, who signed both forms.

During the opening conference, Ms. Lawson explained that the inspection would include a review of the LEA's asbestos management plans; an AHERA walk through inspection at Cherryvale Elementary School and R. E. Davis College Preparatory Academy; and a closing conference. Ms. Lawson interviewed the conference attendees regarding contents/aspects of the management plans.

The LEA's contracted designee, Mr. George D. Cobb, has also served as the LEA's management planner and inspector since 1991. He conducts the AHERA periodic surveillances and LEA reinspections. Ms. Lawson verified the LEA's signed and dated LEA Designee's certification statement and credentials. Mr. Cobb's credentials information is as listed:

Mr. George Donald Cobb
7001 St. Andrews Road
Columbia, SC 29212
(803) 772-1070
Email: edsinc@sc.rr.com

South Carolina Certification: Number: 22081

Management Planner Accreditation:

Training Provider:	Environmental Testing & Management, Inc. 402 Parker Ivey Drive Greenville, SC 29607 Phone: (864) 213-4408
Course:	Asbestos Management Planning Refresher
Course Date:	February 22, 2018
Certificate Number:	MPR022218.01
Certificate Expires:	February 22, 2019

Asbestos Inspector Accreditation:

Training Provider:	Environmental Testing & Management, Inc. 402 Parker Ivey Drive Greenville, SC 29607 Phone: (864) 213-4408
Course:	Inspection of Buildings for Asbestos Refresher
Course Date:	February 22, 2018
Certificate Number:	AIR022218.01
Certificate Expires:	February 22, 2019

LEA Information

The Sumter School District is a local education agency, as defined under TSCA AHERA, which encompasses 27 schools with approximately 17,000 students currently enrolled and over 3000 staff members employed. Sumter School District was formed on July 1, 2011, when Sumter County School Districts 2 and 17 were consolidated. Ms. Lawson verified that each school's management plan was on file in the Sumter School District office.

Custodial and maintenance personnel had received the required asbestos awareness training, which Sumter School District requires annually and is provided through the Safe Schools online training provider. Annual notice to parents, teachers, and workers was verified on the LEA's website, which Ms. Lawson accessed at the website address <http://sumterschools.net/about-us/for-parents-and-students/> on page 3 of "State and Federal Parental Notifications" under the subtitle "The Asbestos Management Plan Notification".

Cherryvale Elementary School:

Ms. Lawson reviewed the LEA's management plan for Cherryvale Elementary School located at 1420 Furman Drive in Sumter, SC. The school building was constructed in 1950. It is a public elementary school with 509 students enrolled in grades Pre-K-5. The school consists of a single building onsite with 71 employees including teachers and administrative, maintenance, janitorial, food prep and service staff.

The management plan includes documentation that AHERA six-month periodic surveillances are current and on schedule. The last six-month periodic surveillance was conducted on April 3, 2018, by Mr. Cobb, and the next is due to be conducted by October 3, 2018. The management plan includes documentation that AHERA three-year reinspections are current and have been conducted on schedule. The last reinspection was conducted on June 15, 2016, by Mr. Cobb and the next is due to be conducted by June 15, 2019. The previous periodic surveillance and three-year reinspection were also conducted by Mr. Cobb.

Management Plan Review

Upon entry at Cherryvale Elementary School, Ms. Lawson presented credentials to Dr. Henrietta Green, Principal of Cherryvale Elementary School. Mr. Fall provided Ms. Lawson with Cherryvale Elementary School's onsite management plan which was in the school's administrative office. Ms. Lawson, using an AHERA inspection checklist (see attached), reviewed the information provided and determined that the information did include a complete and up-to-date management plan.

School Tour

As requested, Mr. Fall provided Ms. Lawson with a tour of Cherryvale Elementary School where she conducted the AHERA walk through. They were accompanied by Mr. Chan, Mr. Cobb and Ms. Tye. All suspect asbestos containing material was included in the management plan's asbestos inspection report and identified if contained asbestos.

R. E. Davis College Preparatory Academy:

Ms. Lawson reviewed the LEA's management plan for R. E. Davis College Preparatory Academy located at 345 Eastern School Road in Sumter, SC. The school building was constructed in 1967. It is a public school which consists of an elementary and secondary school with 429 students enrolled in grades Pre-K-8. The school consists of 3 buildings on one site, which are the main building and two ancillary buildings separated by covered walkways. The school has 67 employees including teachers and administrative, maintenance, janitorial, food prep and service staff.

The management plan includes documentation that AHERA six-month periodic surveillances are current and on schedule. The last six-month periodic surveillance was conducted on April 3, 2018, by Mr. Cobb, and the next is due to be conducted by October 3, 2018. The management plan includes documentation that AHERA three-year reinspections are current and have been conducted on schedule. The last reinspection was conducted on June 15, 2016, by Mr. Cobb and the next is due to be conducted by June 15, 2019. The previous periodic surveillance and three-year reinspection were also conducted by Mr. Cobb.

Management Plan Review

Mr. Fall provided Ms. Lawson with R. E. Davis College Preparatory Academy's onsite management plan which was in the school's administrative office. Ms. Lawson, using an AHERA inspection checklist (see attached), reviewed the information provided and determined that the information did include a complete and up-to-date management plan.

School Tour

As requested, Mr. Fall provided Ms. Lawson with a tour of R. E. Davis College Preparatory Academy where she conducted the AHERA walk through. They were accompanied by Mr. Chan, Mr. Cobb and Ms. Tye. All suspect asbestos containing material was included in the management plan's asbestos inspection report and identified if contained asbestos.

Closing Conference

Ms. Lawson reviewed the preliminary findings prior to the closing conference and completed a Summary of Observations form (see attached). Mr. Dana Fall, Mr. Clyde K. Chan, Mr. George D. Cobb and Ms. Lisa Tye participated in the closing conference. The summary of observations was discussed with them and presented to Mr. Fall, who signed the form. Ms. Lawson indicated that upon returning to the office, EPA's next step would be to review the observations and, if warranted, issue a Notice of Noncompliance indicating any actual violation(s) that the LEA would need to correct, and to prepare an inspection report which would be mailed to the LEA within 30 days.

Ms. Lawson provided the LEA with copies of the following documents during the conclusion of the closing conference:

- Signed TSCA Notice of Inspection
- Signed TSCA Inspection Confidentiality Notice
- SBREFA form
- Signed Summary of Observations


Findings

Based on statements and information provided by the LEA and the AHERA walk through, the findings are as follows:

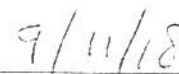
- No potential deviations from the TSCA AHERA requirements were observed at the time of the inspection.

Report Approval

Report - Author

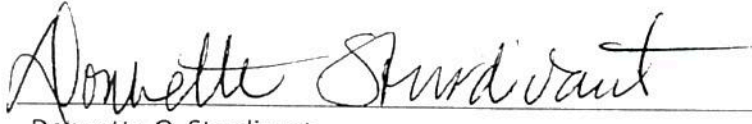


Yvonne Lawson
Inspector
U.S. EPA Region 4
Lead and Asbestos Section



Date

Report - Approver



Donnette O. Sturdivant
Chief
U.S. EPA, Region 4
Lead and Asbestos Section

9/11/2018

Date

